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18 MARK HUNT

19 **UNITED STATES DISTRICT COURT**
20 **DISTRICT OF NEVADA**

21 MARK HUNT, an individual,
22 Plaintiff,
23 v.
24 ZUFFA, LLC d/b/a ULTIMATE
25 FIGHTING CHAMPIONSHIP, a
26 Nevada limited liability company;
27 BROCK LESNAR, an individual;
28 DANA WHITE, an individual; and
DOES 1-50, inclusive,
Defendants.

Case No.: 2:17-cv-00085-JAD-CWH
STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION OF TIME
TO FILE OPPOSITION TO MOTION
TO STAY
[SECOND REQUEST]

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1 Pursuant to Local Rules IA 6-1, 6-2, and LR 7-1, Plaintiff MARK HUNT ("Hunt"),
2 and Defendants ZUFFA, LLC d/b/a ULTIMATE FIGHTING CHAMPIONSHIP
3 ("Zuffa"), DANA WHITE ("White") and BROCK LESNAR ("Lesnar") hereby stipulate
4 to **further** extend the deadline for Hunt to file his Opposition to Zuffa and White's
5 Motion to Stay Discovery [Doc. 47] until May 30, 2017. This Court previously extended
6 the deadline for Hunt to file his Opposition until May 22, 2017, but for the reasons below,
7 this second extension is warranted. This stipulation is based on the following:

8 Defendants' respective Motions to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6)
9 [Docs. 11 and 30] had previously been set to be heard on May 15, 2017 [See, Docs. 13
10 and 46]. Zuffa and White filed a Motion to Stay Discovery on April 20, 2017 [Doc. 47].
11 Lesnar joined in the Motion to Stay Discovery on April 26, 2017 [Doc. 52].

12 Counsel for Hunt and counsel for Zuffa and White met and conferred regarding a
13 potential stipulation that may dispose of or limit the scope of the Motion to Stay
14 Discovery. Their meeting and conferring occurred via written correspondence on April
15 25 and April 27, 2017, and via telephone discussion on May 1, 2017. Counsel for Hunt
16 and counsel for Zuffa and White agreed that they would be in a better position to discuss a
17 potential stipulation that may dispose of or limit the scope of the Motion to Stay
18 Discovery following the hearing on the Motions to Dismiss. However, pursuant to LR 7-
19 2(b), Hunt's opposition to the Motion to Stay Discovery was due by May 4, 2017,
20 whereas the original hearing date on the Motions to Dismiss was May 15, 2017.
21 Therefore, the parties previously stipulated, and this Court previously ordered thereon,
22 that Hunt's opposition would be due May 22, 2017, allowing Hunt one week following
23 the hearing on Defendants' Motion to Dismiss to file and serve his opposition to the
24 Motion to Stay Discovery. [Docs. 54 and 57.]

25 On May 15, 2017, the date Defendants' Motions to Dismiss were set to be heard,
26 the District Court continued the hearing on the Motions to Dismiss until May 22, 2017.
27 [Doc. 60.] Counsel for Hunt and counsel for Zuffa and White conferred telephonically
28 again on May 15, 2017, and agreed that the deadline for Hunt to file his opposition to

1 Defendants' Motion to Stay Discovery should be similarly extended. Given that May
2 29th, one week following the date currently set for the hearing on Defendants' Motions to
3 Dismiss, is the Memorial Day holiday, the parties have agreed to extend the deadline for
4 Hunt's opposition to Defendants' Motion to Stay Discovery until May 30th. Thus, the
5 parties request a **second** extension of time for Hunt to file his opposition to Zuffa and
6 White's Motion to Dismiss (joined by Lesnar) until May 30, 2017, eight days following
7 the new hearing date on Defendants' Motions to Dismiss.

8 Good cause exists for this Court to again extend the date for Hunt to file his
9 opposition to the Motion to Stay Discovery. No hearing date has been given for the
10 Motion to Stay Discovery. Moreover, the parties agree that they are more likely to have
11 productive discussions regarding a potential stipulation that may eliminate the need for or
12 reduce the scope of the Motion to Stay following the hearing on Defendants' Motions to
13 Dismiss, currently set for May 22, 2017.

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1 Based on the foregoing, the parties hereby stipulate and request that the Court issue
2 an Order extending the deadline for Hunt to file an opposition to Zuffa and White's
3 Motion to Stay Discovery until May 30, 2017.

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5 DATED: May 17, 2017

HIGGS FLETCHER & MACK LLP

6 /s/ Scott J. Ingold

7 By: _____

CHRISTINA M. DENNING, ESQ.

8 SCOTT J. INGOLD, ESQ.

9 Attorneys for Plaintiff

MARK HUNT

10 DATED: May 17, 2017

CAMPBELL & WILLIAMS

11 /s/ J. Colby Williams

12 By: _____

13 J. COLBY WILLIAMS, ESQ.

14 PHILIP R. ERWIN, ESQ.

Attorneys for Defendants ZUFFA, LLC

15 d/b/a ULTIMATE FIGHTING

CHAMPIONSHIP and DANA WHITE

16 DATED: May 17, 2017

CHRISTIANSEN LAW OFFICES

17 /s/ Kendelea L. Works

18 By: _____

19 PETER S. CHRISTIANSEN, ESQ.

20 KENDELEE L. WORKS, ESQ.

Attorneys for Defendants BROCK

21 LESNAR

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23 IT IS SO ORDERED:

24 BY: _____

UNITED STATES MAGISTRATE JUDGE

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27 DATED: May 18, 2017

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CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5 and the Court's Local Rules, the undersigned hereby certifies that on this day, May 17, 2017, a copy of the foregoing document entitled **STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME TO FILE OPPOSITION TO MOTION TO STAY [SECOND REQUEST]** was filed and served through the Court's electronic filing system (CM/ECF) upon all registered parties and their counsel.



Melodee Lutjens
An employee of Higgs Fletcher & Mack LLP